

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
(SOUTHERN DISTRICT)**

**EQUAL EMPLOYMENT OPPORTUNITY** )  
**COMMISSION,** )  
 )  
**Plaintiff,** )  
 )  
**v.** )  
 )  
**FREEMAN,** )  
 )  
**Defendant.** )  
\_\_\_\_\_ )

**Case No. 8:09-CV-02573-RWT**

**DEFENDANT’S MOTION FOR PROTECTIVE ORDER**

Pursuant to Federal Rule of Civil Procedure 26(c) and Rule 104.7 of the Local Rules of the U.S. District Court for the District of Maryland, Defendant Freeman, by its counsel, moves for a protective order prohibiting Plaintiff EEOC from deposing Joseph V. Popolo, Jr. The grounds for this Motion are set forth in the attached Memorandum. For the reasons stated therein, Freeman respectfully asks this Court to enter a protective order.

Respectfully submitted,

AKIN GUMP STRAUSS HAUER & FELD LLP

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/s Paul E. Mirengoff

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*Attorneys for Defendant Freeman*

**CERTIFICATE OF SERVICE**

I certify that on March 7, 2012, I caused the foregoing Defendant's Motion for Protective Order and accompanying Memorandum in Support thereof to be served via CM/ECF on Ronald L. Phillips, counsel for Plaintiff EEOC.

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s/Paul Mirengoff

Paul E. Mirengoff